

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**JOSE GUZMAN**

**Case No.: 1:16-cv-03499-GBD-RLE**

**Plaintiff,**

**-against-**

**MEL S. HARRIS & ASSOCIATES, LLC  
LR CREDIT 13, LLC  
SAMSERV, INC  
JOHN ANDINO  
WILLIAM MLOTOK**

**Defendants.**

-----X

**PLAINTIFF'S NOTICE OF MOTION FOR SUMMARY JUDGMENT AS TO  
LIABILITY FOR DEFENDANT LR CREDIT 13, LLC**

PLEASE TAKE NOTICE THAT, upon the accompanying: Declaration of Ahmad Keshavarz and annexed exhibits; Local Rule 56.1 Statement of Material Facts; Memorandum of Law, and upon all of the proceedings heretofore had herein, Plaintiff Jose Guzman will move this Court before United States District Judge George B. Daniels, located at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007-1312, at a time to be determined by the Court, for an Order granting Plaintiff's aforesaid motion.

Dated: Brooklyn, New York  
July 19, 2017

Respectfully submitted,  
/s/

\_\_\_\_\_  
Ahmad Keshavarz  
The Law Office of Ahmad Keshavarz  
ATTORNEY FOR PLAINTIFF  
16 Court St., 26<sup>th</sup> Floor  
Brooklyn, NY 11241-1026  
Phone: (718) 522-7900

Fax: (877) 496-7809

Email: Ahmad@newyorkconsumerattorney.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

SAMSERV, INC  
WILLIAM MLOTOK  
by and through their attorneys of record  
Jeffrey S. Lichtman  
O'Hare Parnagian LLP  
82 Wall Street, Suite 300  
New York, NY 10005-3683  
Phone: 212-425-1401  
Fax: 212-425-1421 (fax)  
Email: [jlichtman@ohareparnagian.com](mailto:jlichtman@ohareparnagian.com)

LR CREDIT 18, LLC  
Scott S. Balber  
Benjamin Mills  
Herbert Smith Freehills New York LLP  
450 Lexington Avenue, 14<sup>th</sup> Floor  
New York, NY 10017  
Email: [Scott.Balber@hsf.com](mailto:Scott.Balber@hsf.com)  
Email: [benjamin.mills@hsf.com](mailto:benjamin.mills@hsf.com)

Dated: Brooklyn, NY

July 19, 2017

/s/

Ahmad Keshavarz  
Attorney for Plaintiff